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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA**

State of North Dakota, )  
Plaintiff, )  
vs. ) Case No. 1:21-cv-00148-DMT-CRH  
United States Department of Interior, *et. al.*, )  
Defendants. )  
Center for Biological Diversity, Dakota Resource )  
Council, Sierra Club, and Western Organization of )  
Resource Councils, )  
Proposed Intervenors. )

## **CONSERVATION GROUPS' UNOPPOSED MOTION TO INTERVENE**

The Center for Biological Diversity, Dakota Resource Council, the Sierra Club, and Western Organization of Resource Councils (collectively, the “Conservation Groups”) respectfully move under Federal Rule of Civil Procedure 24 to intervene as defendants in this action. A memorandum in support of this motion is filed contemporaneously with the motion.

Counsel for the Conservation Groups have conferred with Plaintiffs and the Federal Defendants about this motion. Plaintiffs do not oppose this motion on the condition that the Conservation Groups do not seek an extension of the September 20, 2021 deadline to respond to Plaintiffs’ motion for mandamus relief, ECF No. 5. The Federal Defendants take no position.

Respectfully submitted this 17th day of September, 2021,

/s/ Kyle Tisdel

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**CERTIFICATE OF SERVICE**

I certify that on this 17th day of September, 2021, I electronically filed the foregoing **CONSERVATION GROUPS' UNOPPOSED MOTION TO INTERVENE** with the Clerk of the U.S. District Court for the District of North Dakota and served all parties using the CM/ECF system.

*s/ Michael S. Freeman*